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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CORY ELLINGS, Individually and On Behalf
of Others Similarly Situated,

Plaintiff

v.

KINROSS GOLD U.S.A., INC.,

Defendant.

Case Number
2:25-cv-00098-RFB-EJY

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT KINROSS
GOLD U.S.A., INC. TO FILE ITS
RESPONSIVE PLEADING TO
PLAINTIFF'S ORIGINAL CLASS AND
COLLECTIVE ACTION COMPLAINT
(THIRD REQUEST)**

COMES NOW, pursuant to LR IA 6-1, Plaintiff Cory Ellings (“Plaintiff”) and Defendant Kinross Gold U.S.A., Inc. (“Defendant” or “KGUSA”), by and through their respective undersigned counsel of record, hereby stipulate and agree that the responsive pleading deadline for Defendant, which is currently set for March 26, 2025, be extended until April 9, 2025.

Since filing the Second Stipulation for Extension to Respond to Plaintiff’s Original Class

and Collective Action Complaint (ECF No. 29), the parties have made significant progress in their conferral efforts. Plaintiff has agreed to dismiss KGUSA from this lawsuit and name Round Mountain Gold Corporation ("RMGC") as a defendant in an amended complaint. Counsel for RMGC has agreed to waive service of the amended complaint.

An additional extension of two weeks is needed to hold a final conferral call to resolve the remaining outstanding issues between the parties, exchange declarations, and file the amended complaint.

This is the Parties' third stipulation for an extension for Defendant to respond to Plaintiff's complaint. Counsel for Defendant prepared this Stipulation with the consent of counsel for Plaintiff. This Stipulation is made in good faith and not for the purposes of delay.

Date: March 26, 2025

Respectfully submitted,

JOSEPHSON DUNLAP, PLLC

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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: March 26, 2025